

1 THOMAS E. FRANKOVICH (State Bar #074414)
2 THOMAS E. FRANKOVICH
3 *A PROFESSIONAL LAW CORPORATION*
4 4328 Redwood Hwy, Suite 300
5 San Rafael, CA 94903
6 Telephone: 415/674-8600
7 Facsimile: 415/674-9900
8 tfrankovich@disabilitieslaw.com

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10 Attorney for Plaintiffs IRMA RAMIREZ
11 and DAREN HEATHERLY ,
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15 UNITED STATES DISTRICT COURT
16 DISTRICT OF CALIFORNIA

17 IRMA RAMIREZ and DAREN) CASE NO.CV-11-5293-EDL
18 HEATHERLY,)
19 Plaintiffs,) STIPULATION OF DISMISSAL AND
20 v.) [PROPOSED] ORDER THEREON
21 SIZZLER #0384; ORLANDO ANTONINI;)
22 TOWNVIEW, a General Partnership;)
23 ANTONINI FAMILY PARTNERSHIP;)
24 ORLANDO J. ANTONINI; MADELINE)
25 F. MAJOR; JOHN R. ANTONINI; U & S)
26 CORPORATION, a California Corporation;)
27 SHAZIA KAHN, an individual; and)
28 SHARIF UMAIR, an individual)
29 Defendants.)
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32 The parties, by and through their respective counsel, stipulate to dismissal of this action in
33 its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2). Outside of the terms of the
34 Settlement Agreement and General Release (“Agreement”) herein, each party is to bear its own
35 costs and attorneys’ fees. The parties further consent to and request that the Court retain
36 jurisdiction over enforcement of the Agreement. See Kokonen v. Guardian Life Ins. Co., 511 U.S.
37 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of settlement
38 agreements).

1 Therefore, IT IS HEREBY STIPULATED by and between parties to this action through
2 their designated counsel that the above-captioned action become and hereby is dismissed with
3 prejudice pursuant to Federal Rules of Civil Procedure 41(a)(2). This stipulation may be
4 executed in counterparts, all of which together shall constitute one original document.

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6 Dated: December 19, 2013

THOMAS E. FRANKOVICH
A PROFESSIONAL LAW CORPORATION

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8 By: /s/ Thomas E. Frankovich

9 Attorney for IRMA RAMIREZ and DAREN
10 HEATHERLY

11
12 Dated: December ___, 2013

LAW OFFICES OF DONALD L. COX

13
14 By: _____
15 Donald L. Cox, Esq.
16 Attorney for Defendants U & S CORPORATION;
17 SHAZIA KAHN, an individual; and SHARIF
UMAIR, an individual

18
19
20
21 Dated: _____, 2013

**JEFFER MANGELS BUTLER & MITCHELL
LLP**

22
23
24 By: _____
25 Martin H. Orlick, Esq.
26 Attorney for Defendants TOWNVIEW, a General
27 Partnership; ANTONINI FAMILY PARTNERSHIP;
ORLANDO J. ANTONINI; MADELINE F.
MAJOR; and JOHN R. ANTONINI

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6 Dated: December 19, 2013

THOMAS E. FRANKOVICH
A PROFESSIONAL LAW CORPORATION

7

8

By: _____

9

Attorney for IRMA RAMIREZ and DAREN
HEATHERLY

10

11

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Dated: December 20, 2013

LAW OFFICES OF DONALD L. COX

13

14

By: 
Donald L. Cox, Esq.
Attorney for Defendants U & S CORPORATION;
SHAZIA KAHN, an individual; and SHARIF
UMAIR, an individual

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Dated: _____, 2013

JEFFER MANGELS BUTLER & MITCHELL
LLP

22

23

24

By: _____
Martin H. Orlick, Esq.
Attorney for Defendants TOWNVIEW, a General
Partnership; ANTONINI FAMILY PARTNERSHIP;
ORLANDO J. ANTONINI; MADELINE F.
MAJOR; and JOHN R. ANTONINI

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6 Dated: December 19, 2013

THOMAS E. FRANKOVICH
A PROFESSIONAL LAW CORPORATION

7
8 By: _____

9 Attorney for IRMA RAMIREZ and DAREN
10 HEATHERLY

11
12 Dated: December ___, 2013

LAW OFFICES OF DONALD L. COX

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14 By: _____
15 Donald L. Cox, Esq.
16 Attorney for Defendants U & S CORPORATION;
17 SHAZIA KAHN, an individual; and SHARIF
UMAIR, an individual

18
19
20 Dated: 11/21/14, 2013

21 JEFFER MANGELS BUTLER & MITCHELL
22 LLP

23
24 By: _____
25 Martin H. Orlick, Esq.
26 Attorney for Defendants TOWNVIEW, a General
27 Partnership; ANTONINI FAMILY PARTNERSHIP;
28 ORLANDO J. ANTONINI; MADELINE F.
MAJOR; and JOHN R. ANTONINI

ORDER

2 IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to
3 Fed.R.Civ.P.41(a)(2). IT IS FURTHER ORDERED that the Court shall retain jurisdiction for the
4 purpose of enforcing the parties' Settlement Agreement and General Release should such
5 enforcement be necessary

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8 | Dated: January 10, 2014

Elijah R. O. Lanpte
Honorable Magistrate Elizabeth R. Lanpte

Honorable Magistrate Elizabeth D. Laporte
UNITED STATES DISTRICT JUDGE

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STIPULATION OF DISMISSAL AND [PROPOSED] ORDER THEREON

CASE NO.

CASE NO CV-11-5293-EDL